

Steven Cohn, P.C.
COUNSELLORS AT LAW
One Old Country Road
Carle Place, New York 11514
Suite 420

STEVEN COHN

Tel: (516) 294-6410
Fax: (516) 294-0094

SUSAN E. DANTZIG
MITCHELL R. GOLDKLANG
ALAN S. ZIGMAN
JEFFREY H. WEINBERGER
PETER R. CHATZINOFF
MATTHEW T. FEINMAN

Writer's Ext.: 19

August 25, 2023

VIA ECF

Hon. Eric N. Vitaliano
United States District Court
Eastern District of New York
225 Cadman Plaza
Brooklyn, New York 11201

Re: *Immanuel Piroozian, individually and derivatively on behalf of Higgins Ave LLC v. Shahriar Homapour, Justin Homapour, Judgement Buyers LLC*
Case No.: 23-CV-02445 (ENV-SJB)

Dear Judge Vitaliano:

We represent defendant Shahriar Homapour in the above referenced action. We write on behalf of counsel for all parties in accordance with the Court's Order entered August 15, 2023 directing the parties to file a joint proposed briefing schedule for the defendants' motions to dismiss.

After conferring, the parties propose the following briefing schedule:

Defendants' Motion:	October 2, 2023
Plaintiff's Opposition:	November 16, 2023
Defendants' Reply:	December 4, 2023

Should the Court have any questions or require additional information, please do not hesitate to contact us.

Respectfully submitted,

LAW OFFICE OF STEVEN COHN, P.C.

By: /s/ Alan S. Zigman
Alan S. Zigman

cc: Alexander Kadochnikov, Esq. (via ECF)
Lawrence V. Carra, Esq. (via ECF)